

Transcript - April 5 AmeriCorps Rulemaking Session

AMERICORPS RULEMAKING SESSION

APRIL 5, 2004

CONFERENCE CALL

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Coordinator Hello, and welcome to the rulemaking conference call. All lines will remain in a listen-only mode. Following today's presentation, we will take statements. At this time, I would like to turn the call over to Mr. David Eisner.

D. Eisner Hello, and welcome to this, our final public input session for rule making, or pre-rule making. Before I begin, it would be helpful for us to get an indication of how many people we have on the call that would like to make statements. If you are interested in making a statement, would you please press *1 now on your touch-tone phone. Cecile, in a few moments will just tell us how many folks have done that?

Coordinator Mr. Eisner, at this time I indicate that we have at least 13 participants that would like to make statements.

D. Eisner Terrific, thank you very much. Thank you to everyone joining the call, for taking part in this discussion. As I mentioned, it's the final pre-rulemaking public input session. With me in the room is Rosie Mauk, Director of AmeriCorps, and Frank Trinity, our General Counsel.

We want to spend almost all the time listening to your comments, but let me spend just a minute setting the stage. It's been as everyone realizes, an extremely challenging couple of years for the corporation. Yet, we've emerged from 2003 with some real momentum behind us, including an historic 2004 budget that could support a record 75,000 AmeriCorps members, 550,000 SeniorCore members, and 1.8 millions students participating in Learn and Serve America.

Also, ironically, given how challenging the past couple of years have been, we also have stronger bipartisan support for the work that AmeriCorps does and the other service programs do, than we've ever had. Our goal is to take that momentum and move it forward. One of the sticking points in achieving the permanence of that kind of momentum and the permanence of our bipartisan support, is that every year, we end up debating key issues around AmeriCorps: sustainability, cost per member, matching requirements, performance measures. That's created a lot of instability and uncertainty among our grantees.

Our grantees are never sure from one year to the next, what the requirements are going to be. They're never sure from one year to the next, even what our cost per FTE will be; how much they'll need to raise for the match. In dealing with their partners, the partners never have a level of confidence that National Service will be there, so our

grantees are having a hard time in fundraising relationships and in strategic operational partnerships, because the partners are always questioning. "Well, what's the future of this program going to hold?"

We're going to try to do rulemaking by turning our annual guidelines process into regulations that will make the program more efficient, effective, and accountable, as well as predictable and reliable for our grantees.

In addition, the corporation has received very clear direction from the President, from Congress, and our board of directors, that we need to use the rulemaking process to accomplish these goals as quickly as possible in time for the 2005 grant cycle. So we're on an accelerated timetable, and yet, we decided not to rush forward and do rulemaking as it might traditionally be done – drafting rules and then receiving public input, and then finally issuing final regulations – but rather to proceed that process by a public input process, so that we could harness the skills, energy, creativity, and experience of the people that have spent the last ten years making this program a success. We don't believe that we can do a decent job at these rules without the thoughtful and energetic participation of our field.

That's what we're doing here today; that's what we've been doing for the past month or so. Rosie is going to walk through the issues that are before us, and some of the direction that we've been provided. It's important to note that we do have real pressure to get this done, and we have real pressure to deal with these key issues, particularly sustainability, federal share matching requirements. We've been told to make the program more efficient. We've been told to lower costs. We've been told to define and to ensure our sustainability among our grantees.

Before I turn it over to Rosie, I just want to make two more points. First of all, we have not predetermined in any way, what the outcome will be. We know that we will strive for an outcome in the allotted time. We know that the outcome will address sustainability, federal share matching requirements, as well as other issues that Rosie will outline. But what models or systems or mechanics we'll put in place to accomplish those objectives remains for us, as well, to be seen. Although immediately following this conference call, we're going to start working on that.

Then, secondly, that we're looking for a fair and open process as well as a fair and equitable outcome. We believe that we can achieve that, in this, the last public discussion. I'm more confident now than I was when we started this process, that we can achieve that kind of equity.

With that as background, let me turn it over to Rosie to summarize the key issues. Then, after Rosie, we'll ask folks to make their statements and we may engage from time to time in some questions and answers with the people making the statements.

R. Mauk Thanks, David. Welcome everybody; thanks for joining us. I'm hoping that all of you have already downloaded our materials from our Web site. If you haven't, please go to our Web site, and we have all the issue areas that I'm going to walk us through on our Web site, taken right from the Federal Register. There are also some Q&As, etc., that you can take a look at, but I'm going to walk us through some of this stuff. The seven main issues that we will be addressing, but also, folks have given us some others they'd like us to look at.

One is a very general question: as AmeriCorps continues to grow, what changes can you identify to make the program more efficient and effective? Our board recommended to us over a year ago, that we consider greatly streamlining our annual guidance by converting appropriate application guidance and provisions into regulation.

In regards to sustainability, a few questions that we'd like you to help us address. How can the corporation and the field achieve the right balance of federal and private support? To what extent should the level of corporation support for a program or project decrease over time? How can the corporation further support and encourage greater engagement of Americans in volunteering?

Our board and our appropriators have asked us to define sustainability, and Congress has said the corporation may establish policies and procedures to set limits on the number of years recipients may receive assistance to carry out a project. Increased match requirement and infinite measures to determine whether projects are generating sufficient community support.

In the area of federal share, should the corporation calibrate matching requirements to reflect the differences among programs? Should the corporation adopt matching requirements for member related costs that are different for requirements for other program operation costs?

The White House has said in their executive order, national and community service programs should leverage federal resources to maximize support from the private sector, and from state and local government, with an emphasis on reforms that enhance programmatic flexibility, reduce administrative burdens, and calibrate federal assistance to the respective needs of recipient organizations.

Our appropriators have said to the maximum extent practicable, the corporation shall increase significantly the level of matching funds and in kind contributions provided by the private sector, and shall reduce the total federal cost per participant in all programs.

Around the issue of performance measures and evaluation, what are appropriate performance measures for programs, and how should grantees evaluate programs? In the executive order it said, " National and community service programs should adopt performance measures to identify those practices that merit replication and further investment, as well as to insure accountability."

Around the area of literacy and reading tutors; how can we ensure that members serving as reading tutors have the skill and ability to provide the necessary instruction to the populations they serve? And what should the curriculum and training requirements be for literacy program? Again, in the executive order: national and community service programs based in schools should employ tutors who meet required

paraprofessional qualification and use such practices and methodologies as are required for supplemental educational services.

The last two, one regarding the timing of our grants, does the current timeframe for awarding grants work and what improvements can we make? Our board of directors encouraged us to consider shifting our grant calendar back, and the appropriators have said that they encourage the corporation to consider a change to the grant cycle, so that grant awards can be made to recipient organizations before the organization recruits members to fill awarded slots.

And last, our selection criteria, what criteria should the corporation use in selecting programs? How can the corporation streamline its grant application process for continuation applications? Our appropriators have said for the corporation to ensure that priority is given to programs that demonstrate quality, innovation, and sustainability.

With that, that's all we have to say to you going into this, and now we're ready to hear some of your suggestions for us. I think – was the process *1?

D. Eisner I think actually folks have already done that.

Coordinator Yes, sir. At this time, we will take our first statement from Jeff Smith.

J. Smith Yes, I coordinate a program here in Minnesota. I guess the idea of the federal support decreasing over time is something we're struggling with, since it's harder for us to find private sector dollars now as the federal money is being taken away. We're concerned about what that means in the future if more federal money is taken away, and we have a harder time raising the private sector dollars. How we're going to be able to sustain our program? That's our question, I guess.

D. Eisner In general, what we're trying to do is solicit as much input as possible. So I'll ask you a question. Understanding that you're concerned, is your concern about the general theory or axiom that as an organization matures, it should be able to demonstrate increasing support from the community through a larger match? Or is your concern that that graduating match be sufficiently calibrated and/or gradual and take individual circumstances into effect, so that it doesn't unfairly disadvantage specific programs?

J. Smith Yes, my question I guess is, is it fair to say that down the road, we can expect to be completely phased out, where there won't be any federal money left and it will be all eventually be privately funded? Because from a fund raising standpoint, it's been difficult to sell corporations, the idea that a program that was federally funded is now not, we need their support. Because a lot of them think that if it was a program that was started through the government, why is the government now pulling out then? Why do they want to jump in and fill the role if the program was started by the government? That's just a general concern I guess, I'm not asking for a response, but just our concern.

D. Eisner Thank you.

R. Mauk We also needed to indicate to you – I don't know if the operator did – that this call is being recorded, and so if you can be sure to identify yourself and your program when you come on, that would be really helpful for us.

Coordinator Thank you. Our next statement comes from Linda Terry.

L. Terry My name is Linda Terry. I'm with Keepers of the Land AmeriCorps program in the Iowa Department of Natural Resources. I would like to respond to Jeff Smith's comment, in that the AmeriCorps program works because everybody puts in a little and the return is great. If the federal portion pulls out, then that formula is not going work, I don't think, in my opinion.

My next point is ours is an environmental program, and I respectfully ask that funding be continued to environmental programs because there is so, so, so, much to be done. Also, because we are environmental, most of our sites like to enroll early spring. So a flexible program start date would be very helpful, and eliminate having to request a continuation.

... I'd like to see be transferable to family members. This would increase the age diversity, allowing older members to gift their ... to children, grandchildren, nieces or nephews. The wealth of knowledge that comes in those older members is incredible.

Allowing programs to divide full-time positions into part-time or seasonal positions, as we have been allowed to do in the past, certainly helps keep our program fully enrolled. Please reinstate that practice. I want to add my voice to those on the last call, to please allow programs to refill the slots of members who leave their service early, as not doing so crucially jeopardizes our relationships and credibility with partners.

I feel that program directors spend so much time justifying our existence, that we are left with little time to do the job we are hired to do. I understand the need for reporting, but suggest that we be granted money for support staff. I would also appreciate a decrease in paperwork and even more streamlined accountability practices, and I am thinking on how to get that done. I want to thank you for this opportunity to give input.

D. Eisner Thank you very much; that's a very helpful list.

R. Mauk Linda, as you think through some ideas that you have, we'd love for you to send them into our rulemaking e-mail address. That would be great if you've got some suggestions, especially on the streamlining.

L. Terry Okay. Thank you.

Coordinator Thank you. Our next statement comes from Robert Markey.

R. Markey My name is Robert Markey. I'm a director and a partner of Bain & Company, which is a global strategy consulting firm. I'm also a board member of City Year in New York. My personal involvement with City Year began when I was an MBA student at Harvard in 1988, where I helped City Year develop a serv-a-thon, which was a way for City Year to raise money from the local community, while also doing service – mobilizing thousands of Boston residents.

My company has also been involved from the very beginning with City Year. Since City Year's founding in 1988, Bain & Company has been a partner in the efforts to build and strengthen the national service movement. The relationship between Bain & Company and City Year includes providing pro bono teams of consultants that enable City Year to strengthen its processes and expand its programs, and develop its service strategies. It involves the sponsorship of City Year teams of core members in Boston and New York, and over the years, we have sponsored teams in other cities. And it involves encouraging our employees to participate in city or service activities that are led by AmeriCorps members.

The service activities are generally designed to strengthen communities in a range of activities from community service days to educational activities around schools. For example, this past December, we had more than 450 Bain employees in Boston and New York, doing a full day of service, alongside the AmeriCorps city or core members. Bain employees serve in a variety of other volunteer roles with City, including tutoring students or coaching the core members themselves.

I wanted to focus my comments this afternoon on the public/private partnerships and the importance of continuous and consistent levels of federal funding in those partnerships. The employees of Bain & company support city or core members with a team sponsorship for a variety of reasons, including the impact that they have on the communities where we live and work. One of the most important and attractive facets of AmeriCorps programs is their ability to unite Americans from different backgrounds to strengthen our communities and our country through service. The public/private partnerships unite participants from different sectors of the economy to enable AmeriCorps members to have impact and mobilize others in service.

Bain & Company's partners and its employees know that when we invest in City Year, our financial support is one component of a unified effort to strengthen our community and our country through service. I've been told that our partnership with City Year might be a little bit rare. The Bain & Company team sponsorship decision and the financial support are not provided by the company or by a committee, but instead our funding comes directly from the individual contributions of individual partners and employees.

When the federal government funds an AmeriCorps program, like City Year, it is providing to people like us, a seal of approval that the organization has the potential, the infrastructure, the local partnerships, to truly make a difference. That seal provides the credibility that encourages our employees to match every dollar of the federal government's investment with the dollar support from their own money and from the company. Of course, in many cases, our support is turned into matched dollars raised by City Year by foundations and other citizens who believe in the power of AmeriCorps.

As you review the current model and you think about the rules that you're considering here, I'd encourage you to consider the following. First, most corporate executives like us, join in supporting City Year and AmeriCorps because we find this private/public partnership highly attractive. In New York, there are a number of us who remember the city volunteer cores, which failed partly because it was purely funded from the local government. I'd urge you to continue to fund AmeriCorps without a cap in timing and at consistent levels, as long as the programs continue to meet or exceed the standards for performance that we've set, and so long as they're competitive amongst the applications for funding.

Second, successful, long-standing programs are capable of providing higher quality services and stronger partnerships, as long as they can focus more of their time, more of their resources, more of their staffing, on program and service delivery. We at Bains strongly believe that creating incentives for the creation of small, fragmented, new organizations, runs exactly counter to what will create a strong community service infrastructure. These small organizations can often be inefficient and ineffective, and it turns out that the benefits of accumulated experience and scale are significant. Without the public/private partnership, programs would be forced to spend more time securing support from the volatile private and philanthropic sector, and a lot less time on improving service delivery.

Third, the public/private partnership should be expanded to include local or state funding. While the federal government shouldn't pass along their share of the responsibility to the local or state governments, we believe that it is important to offer incentives for city councils and state assemblies to become partners in these efforts.

Thank you for the opportunity to express my opinions. Like many Americans, I'm inspired by the President's and the Congress's support, and belief in the power of national service to unite Americans, and to address these needs. Thanks.

D. Eisner Robert, thank you, both for the testimony and also for your strong and work and partnership with City Year. I want to make sure I understood a piece of your testimony.

At one point you said that the organizations that have accumulated more knowledge and that grow over stronger time can have deeper relationships with the community over time. Another point, you spoke about the benefits of accumulated experience and scale. That is often, we hear, tied to the reasonableness of expecting graduating matching requirements. That as an organization moves from being a new AmeriCorps program to an experienced one, that it is a) more efficient, and b) better able to leverage its relationships with the community. Is that where you were going with that?

R. Markey Not exactly. What we believe is that the benefits of accumulated experience and scale, allow an organization to become more efficient and more effective in recruiting core members, in executing service, and running the organization of lower ratio of overhead to program dollars. We actually believe, though, that a graduated scale for matching would be a mistake because it would reduce the number of AmeriCorps members per dollar of private funding raised.

D. Eisner I'm not sure I understand. You're saying that all of the benefits of that experience and scale, even if an organization has lower operating costs, that the federal government should continue to pay the same share of operating costs?

R. Markey What I'm saying is that what we would like to see is that money plowed back into more program dollars, so a larger number of AmeriCorps members. What we don't want to see happen is in essence – and this may be a harsh way of saying it – but we don't want to see inefficiency rewarded and efficiency penalized. The essence of a graduated program like that is that it would, in essence, penalize efficiency, and starve the highest functioning organizations.

D. Eisner Thank you very much.

Coordinator Thank you. Our next statement comes from Gale Orange.

G. Orange I'm Gale Orange, the interim Executive Director of Camp Fire USA West Michigan Council. Camp Fire is in its third year of AmeriCorps funding through the Michigan Community Service Commission. Camp Fire USA is a youth development agency. AmeriCorps members serve in our neighborhood youth development program. Members help deliver after-school and summer programs for 5 to 14 year olds in low income, at risk neighborhoods. During the school day, they work one-on-one with children as part of the school district's reading and mentoring program. They also teach six week segments of Camp Fire's life skills curriculum in the elementary schools.

I would like to address the issues of grantee sustainability, specifically as it pertains to ongoing program funding and the role of AmeriCorps members in volunteer recruitment. Under the category of ongoing program funding, Camp Fire's AmeriCorps program has been successful. It has met its goals of increasing the number of children and youth in low income, at risk neighborhoods, who participate in out of school time programming, and who are accumulating the developmental assets they need to successfully grow into adulthood. AmeriCorps members are making a difference by serving our community's most vulnerable children.

After the first three years, we are asked to raise a larger share of support for the program. At Camp Fire, meeting the increase in matching funds will continue to be a struggle. If a program continues to meet the needs of its community and the objectives of its grant proposal, the corporation should have an invested interest in its continuation. In evaluating success and determining program sustainability, the corporation's competitive process should consider the strength of an organization's tie to community partners, the strength of its local leadership, the diversity of its funding sources, its longevity in the community, its expansion of the volunteer base in a give community, its ability to secure multiple stakeholders, its commitment to diversity, and its impact.

AmeriCorps member's service has made a difference. Camp Fire has doubled the number of after school program sites, we've increased the number of children and youth served in after school and summer programs. Increased the number of hours per week that kids have had after school programming, added a spring break day camp for the children living in a subsidized housing complex, and we've introduced life skills curriculum to inter-city students, adding 1,233 elementary school students in the last two years. That's as a result of the involvement of our AmeriCorps members.

The challenge of raising funds is not indicative of a program's level of community support. Corporate foundation funding typically has at best, a three to four year lifecycle. Supporters provide dollars to a specific program, activities, and priorities, not AmeriCorps in general, and these resources are not transferable.

The majority of Camp Fire's programs are in partnership with a large urban school district, which faces its own funding issues, that make it extremely difficult to provide funding support other than in-kind services, such as facilities, training, and meals and snacks through the nutrition center program.

The administration and faculty of the schools we serve are some of our most ardent supporters. The time members spend time, helping children in the reading program is

invaluable to teachers, and just as important as the role modeling, relationship building, and leadership members offer in the after school and summer programs.

In the area of volunteer recruitment, we know that volunteer recruitment is tied to sustainability. Volunteer recruitment is key, however, volunteers cannot replace the service of AmeriCorps members. Over 1,000 children and youth living in Grand Rapids' poorest neighborhoods have a non-parental adult at Camp Fire every day that will listen to them, talk with them, and share with them. Most of these adults are AmeriCorps members who serve in the schools during the day, and then in the after school program. Members establish relationships with children, and are constants for these kids who have precious few people and things that they can count on in their lives.

Most of the volunteers that we do recruit are college students who have ever changing schedules, and while their contribution is valuable, it does not provide the needed consistency for children and youth. Every effort is made to recruit from the neighborhoods and the families we serve, but it is rare to find a volunteer when our families are just struggling to get food on the table and pay the rent.

The college student, senior citizen, and other volunteers are crucial to sustainability, but they rarely will volunteer to the same level and consistency of the AmeriCorps member. Volunteer recruitment remains key to Camp Fire USA programs, and serving children and youth. Volunteers again, cannot replace the consistent presence and time commitment of AmeriCorps members serving in our programs. I want to say thank you for this opportunity to give testimony and the inclusiveness of the process.

R. Mauk Thanks, Gale. I'd like to just make sure I understand. I know you're funded under the Michigan Commission, and you said that after three years you have to increase your match, is that right?

G. Orange That's correct.

R. Mauk What percentage of increase do you have to raise it? Do you know?

G. Orange Yes, I do, and I just have to find the right page.

R. Mauk Okay, how about at the end of six years, does it change then, too?

G. Orange Third year is 67% to 33%, and then the sixth year is 25% to 75%, and after year seven, it's zero to 100%.

R. Mauk This is for the member cost? Tell me for which item, be it program dollars or your member cost.

G. Orange Actually, the figure I gave you was for program operations, and the match percentages. The member support match percentages in the third year are 85% to 15%. Of course, always 85% to 15%, so the program operations for the third year are 67% to 33%. Am I answering your question, Rosie?

R. Mauk Yes, you are.

D. Eisner I guess the question that I have is regardless of what we do, will Camp Fire continue to be able to use AmeriCorps members, based on the rules that Michigan now has in place?

G. Orange We are certainly trying to do that because we think it's so valuable to what we do.

D. Eisner Right, thank you very much.

Coordinator Thank you. Our next statement comes from Addell Anderson.

Dr. Anderson I am Dr. Addell Anderson. I'm a director of Michigan Neighborhood AmeriCorps program. Our program is based at the University of Michigan in Ann Arbor. Since 1995, we have served the metropolitan Detroit community. I've already provided testimony during last week's public meeting. I would like to follow up, though, on two of the issues posed through the rulemaking process. That has to do with grantee sustainability and performance measures and evaluation requirements.

During the public meeting held on March 31st, a concern appeared to be raised, as to how CNCS could accommodate new or fledgling programs, if existing programs can continue to be eligible funds with no limit on the number of years those monies may be granted. We contend that whether or not an existing program should continue to be granted federal funds should be based on the ability of the program to address significant community needs, performance evaluation, and proven financial and administrative accountability.

We believe that existing programs with a proven track record, along with the people they serve, should not be penalized for success, but be rewarded with continued federal funds support to leverage critical matching funds from private sources. Federal funds should be spent where these dollars can best meet the mission and objectives of the AmeriCorps program. The decision to grant federal funds for a specific program, whether new or existing, should be based on who can best meet the parameters and priorities set by state commissions. We believe that the state commissions will best know these programs and the need for the communities they serve.

Concerning the second issue to be addressed, we contend that performance measures and evaluation requirements should be more rigorous for programs three years or older, than that have received federal funding for less than three years. Most of us are aware that it takes a few years for any new program to become comfortable with the parent program's policies and procedures. It would thus be unfair to judge new or fledgling programs under the same standards as those for existing programs. Moreover, we believe the current performance measures scheme should be redesigned to better accommodate multi-site and multi-service area programs.

Our particular program represents one of the larger AmeriCorps programs in the state. We are a dynamic and collaborative partnership of graduate and undergraduate programs at the University of Michigan, and community and safe space nonprofit organizations based in Detroit. Our mission is to address local human needs through direct service program activities related to education, urban planning, social work, health and economic development.

As you know, Detroit is a large, diverse, and vibrant metropolitan area. Significant revitalization efforts are underway as the city is experiencing renewed interest and excitement. Nevertheless, historical economic dislocation, population out-migration, and dis-investment by companies, left a weakened infrastructure, inadequate services, and many children and families living in poverty. Obviously, no single strategy can effectively meet these challenges. Instead, our program developed a successful, multifaceted approach, servicing multiple sites.

The current performance measure design does not readily allow for meaningful reporting of outcomes from a program, such as ours, that serves several major service areas in multiple sites. That is why we request a change in design to better accommodate programs, such as ours. However, we believe that any change in existing program measures and evaluation requirements, should be made in consultation with a representative number of program directors, who have practical experience in dealing with these performance reporting and evaluation issues. Thank you again for this opportunity to speak on these concerns.

D. Eisner Thank you. Let me ask you, you note as several have, that we should be letting performance dictate the extent to which we provide funding decisions. Then, you also noted, that we need to redo our performance measurement systems, particularly in order to provide better opportunity for diversity systems. One of our challenges is that without any kind of standardized performance management indicators, we actually are very hard pressed to use performance measures as a tool in any kind of competitive setting. How would you recommend that we resolve that?

Dr. Anderson I believe that what may have to happen is that there are different categories, depending on the size of the organization. Since we do use about 70 members a year, and we deal with five major service areas, probably what we should be doing is competing against organizations with a similar design. Maybe those things cannot happen within a state. Maybe a program, such as ours that are multi-area, we have to be in competition with programs across the country, instead of just in a single state. Because we might be just one of two programs like this in the state, whether they are new or existing.

D. Eisner Thank you very much.

Coordinator Thank you. Our next statement comes from Joanna Johnson.

J. Johnson This is Joanna Johnson. I'm calling from Florida, and I've been a program director now for six years, and with the same program. I came out of the classroom actually, teaching in an elementary school setting. Our program is an education-based program. Of course, the emphasis is on tutoring and mentoring. We've seen substantial evidence that this kind of a program works. We're very excited here in Florida to see our members serve as tutors and to provide a service that, quite frankly, as a classroom teacher, I know all too well – teachers cannot meet all of the needs of the students.

I understand the concern that the President and many have with requiring certain indicators or making requirements on the AmeriCorps members for them to serve, for them to be trained properly, for them to have specific reading strategies training if they're working with reading tutoring or math tutoring, certain math training. However, I do have to express my extreme concern with the indication that there's a movement

because of the No Child Left Behind Act, that there is the move towards the requirements emulating those of paraprofessionals.

Requiring for example, here in Florida, our paraprofessionals are required to have 60 hours of college credits in order for them to have a job in any of our schools. They have strict requirements, and we have found that to be an issue here in Florida, that it's difficult to find people who are able, who are qualified, to serve as paraprofessionals.

We all know that the living allowance for AmeriCorps members across the board – across the nation – although they are different for different sites, but it's comparatively low because it is considered just an allowance and not a job. I want you just to understand and consider from the perspective of from a program director, that although it sounds great to have requirements set, and it sounds great to have in theory standards set for making sure that members are qualified to tutor children, we should be very careful that we don't put such strict parameters, that we don't cut our nose to spite our face. It's already so difficult to find – certain years, it's more difficult to find people who are willing to serve their nation as great as it sounds.

We work very hard as directors to recruit and to make that campaign to have people come on who are willing to serve for about \$10,000 a year. Many of them sacrificing family and sacrificing to be able to do this. Most of them for that education award in mind, but in any case, I just want to caution to be very careful in what parameters are set. And when you do look at what requirements need to be made for those programs that are tutoring programs, that you really consult with educators, that you consult with school districts, and that we are very careful to look at all of those factors.

That's my number one, main concern, and I don't know if I'm saying that quite right. But in any case, looking at these possibilities, I would just ask that you carefully consider how much of an in service it would be doing to put too strict requirements on members as tutors.

I just wanted to say, in speaking about the education award, I would like to just reiterate and voice my concern as well, about the fact that the education award is not transferable. We have had in our program members from age 18 to 80. As great as it is for those members who are seniors that serve in our program to have an education award presented to them, most of them are not as interested in going to college themselves, and would love the opportunity to transfer that to a child or grandchild. Someone in their family that could benefit more than they do.

At the same time, for them to give up that education award or to opt out to not have it, is a disservice to them because they have earned that prize, if you will. They've earned that privilege, yet they're not often really anxious about spending \$4,700; whereas they might would take a portion to take certain classes that they're interested in. It would be nice if that could be transferable, so I did want to voice my opinion about that.

I do agree with the other comments that have made that what we find with soliciting funds and going out trying to fundraise and work with our communities, that the truth of the matter is, our communities are not an unlimited resource of financial support, as you well know. There is a point where they become "tapped out." It's very competitive, especially in certain communities. It's very competitive to get your funding, to keep funding, to keep partners, and to keep those partners interested in what you're doing. As great as our numbers have been – we have had very high success rates with our

program – they still look to see if the federal government seems to be pulling out or drastically reducing to where we may no longer receive any federal funding, or it gets to a point where there is so little federal funding.

I would like to also speak to that to say that we see that effect, too. That our partners are more willing and more apt to fund if they see the validity, based on the federal government. If they see that the government is funding, then they are willing to say, “Hey this looks like a program if the government believes in it, we’ll keep funding.” But when the dollars start pulling out, where there is the air of threat that it may be pulled to where there is a cap, or there is a limit on the funding or how many years we are allowed to be funded, then they look at it and say, “Well, if the government doesn’t believe in it, then I’m not sure if I want to put my money in that.”

We have been fortunate and successful, but I do see that this not something that we will always have that luxury. Two points about that is to please consider that although the funding does diminish, just consider that we don’t get to a point where there is too much of a burden on programs to find the funding.

Number two about that, I disagree with the move to stop funding programs who are successful. Again, everything and ditto that most everyone has said today in this conference call. Be careful that we look at the reality that if a program is successful, it is a punishment to cut that funding or to limit the number of years that that program can serve, whether or not another program can come in behind and be as successful, or whether that program can continue to sustain, certainly, not at the capacity that we are providing the services now. Those are my concerns, and I just appreciate you guys giving us all an opportunity to voice our concerns.

D. Eisner Thank you. Go back to the tutoring issue. I’m trying to figure out if the more important point is, don’t put restrictions in place because by the time they get down to the operational level, they’ll end up restricting your ability to work with tutors. Or whether your point is put restrictions in place, but don’t make them as onerous as, for example, requiring 60 hours of college credits.

J. Johnson I guess it’s almost an oxymoron or a catch-22. As a classroom teacher, I’m passionate about making sure and ensuring that our students receive quality education, whether it’s from a volunteer, whether it’s from an AmeriCorps member, whether it’s a classroom teacher. I’m very passionate about making sure that students receive quality education.

So I do agree – as controversial as that may be – I do agree with examining and looking at tutoring programs, making absolutely sure the members are trained effectively; that they receive certain basic training. For example, ours is a reading/tutoring program. I would say that it would be very beneficial to look at basic components of reading that would be minimum standards set in place that no one who has a tutoring program should be in disagreement with.

On the one hand, yes, I do believe that programs should be monitored in making sure members are receiving quality training, so that they are providing the education or they are providing the service that they are trained to provide that service. But on the other hand, it is more important for me to say, please be ever so mindful that too high of a standard will, in fact, ruin the programs. It will spoil the programs, because we already

have difficulty finding members some years; some years are harder than others. I know what a struggle it is to find paraprofessionals who meet the standards.

D. Eisner Okay.

J. Johnson I just ask you to really consider that if you set a standard, which I do agrees with some kind of standard, please be careful not to go too high with that that we ruin our recruiting.

D. Eisner Thank you very much. Cecile?

Coordinator Yes, sir. The next statement comes from Marilyn Rosche.

M. Rosche Marilyn Rosche. I'm the director of Rochester AmeriCorps in Rochester, New York. I want to start out by saying I really appreciate the opportunity to give input at this stage. I think it's very reassuring to us to know that you're going above and beyond requirements.

I wanted to focus my comments on the things that are causing the biggest concern. The first of those is the idea of limiting the number of years that a program can receive funding. I see this as a really self-defeating option. I think we need to build on the experience in the field and the infrastructure that we have developed over the years that we've been out here. AmeriCorps is not an easy program to operate well, and I feel that by basically eliminating programs that have been around for a number of years, it really equates to discarding one of your most valuable assets.

I think the current system is competitive. The process gives you an opportunity to both add new programs and to discontinue funding for poor performing programs. Any larger scale turnover of the high quality grantees, I feel will seriously weaken the program.

We operate a scatter site program, so in effect, we're serving as a intermediary for small, community-based organizations and faith-based organizations that lack the capacity, the staffing, or the expertise to operate their own program. Even with efforts on our part toward helping them build capacity, they probably will really not have the economy of scale at any point to operate their own AmeriCorps program. So what we're doing really is allowing them to access a federal resource that otherwise would probably be unattainable for them. We approve on work with a different mix of sites every year, so we are allowing these accessibility throughout our community for the AmeriCorps funds.

I think there needs to be a recognition that it really takes time to build these kinds of relationships, and by basically operating a program over a number of years, we give the whole process stability in the eyes of the community.

One of the specific questions that was asked, was what is the viability of our program without federal funds? It's zero. I think whether you're talking short-term or long-term, we, as a discreet entity in the community would not exist without the federal funding. I believe that sustainability must be defined, using additional dimensions beyond whether we can continue without federal support. We have incredibly extensive support from community partners. I think that we have done an outstanding job of raising money over time. We have a very diverse and stable funding base in the community, but we

just wouldn't be here if the federal money weren't here. I think looking at some dimensions of sufficient community support short of withdrawing federal support is really critical.

In terms of a balance between public and private resources, I think you shouldn't underestimate the incredible power of saying to private sources, that their contribution leverages federal dollars. We have had funders say to us that that provides so much motivation for them continue supporting us. But foundations and corporations and other levels of government are all strapped. The competition for funding is fierce, as resources are limited.

As I said, we've been very successful in raising money. What we've done is come up with a self-sustaining method of cost sharing with our host sites. We also have enjoyed almost unprecedented tenures of support from our local community foundation, and we generate really almost limitless in kind on the operating side of the budget. We overmatch our member support. Right now, we're matching with cash at 24% of member support, but I don't want to be penalized for having done that. I don't want that to go up when I feel that we're already doing well beyond what is required.

I think there needs to be a greater distinction between the level of cash match and the level of operating match, which in many cases is primarily in kind. We can increase the in kind match for the operating side of our budget almost without limit, but we can't decrease the federal cash that we need to operate bottom line. I think those are really two different parts of the equation, both the split between federal and nonfederal resources but the bottom line in terms of the federal cost per member.

I did a little research this morning to have some background – our history here in Rochester. In '95-'96, which is my first year with the program, the second year of program operation, our federal cost per member was \$12,094. The living allowance back in those days was a little under \$8,000. Nine years later, our proposal for next year – our cost per member – is \$12,800. The living allowance will be just over \$10,000. So over nine years of operation, our federal cost per member has increased – nine years remember – a whopping grand total of 6%, not per year, but total for nine years, while the living allowance has gone up 28%.

I think eventually, we're going to reach the point, where there are only two possible outcomes of this scenario. One is the grantee organizations will say they can no longer operate the program with the funding that is available; it's just going to cost them too much and take too large a commitment, and they will withdraw. Or, for those that stay in, I think the quality of the program is going to suffer, our ability to adequately train and oversee members to monitor sites and to report outcomes. We're just going to be stretched thinner and thinner and thinner.

I'm less concerned I guess with some of the questions that were raised about funding cycle and continuation requirements. I kind of see my job to manage those parts of the program, and it would be nice if it were easier, but if it isn't, we'll manage. I'm more concerned long term with surviving, and whether the program is really viable for my sponsoring organization, which is a community college, to continue to operate.

I do have to say, though, that I've developed some pretty severe concerns this past go around about the review and selection process. I was actually shocked when I saw some of the language that came from the corporation back in June, when the first round

of competitive were announced. There was a letter that said that some things might need to be negotiated with state commissions, and it cited the program may be committed insufficient match. The corporation share, perhaps, exceeded the 15% for maximum cost, performance measures might have been inadequate, or the program perhaps had not submitted a sustainability plan.

I guess for those of us who had been receiving competitive funding the last couple of funding cycles, and we're not successful this time around. The thought that there were programs that were selected for competitive funding that didn't meet some things that I consider really, really basic, it shocked and dismayed me; and I hope that that process will be more fair in the future.

R. Mauk Thanks, Marilyn.

D. Eisner Thank you. Let me make sure I understood. I appreciate that there's a specific challenge in working with intermediaries. Did you say that the small community-based and faith-based organizations that receive the AmeriCorps members that you send to different organizations each year?

M. Rosche We have some sites that have been with us with all ten years of our operation, but we tend to have mixture of some new sites every year.

D. Eisner Do you have any graduating requirements on your sub-grantees?

M. Rosche In terms of financial requirements?

D. Eisner Right, or any timeline cutoffs or anything like that?

M. Rosche We don't have a timeline limitation. We do have financial requirements, but the only sense is, which they're graduated is we use a sliding scale for our cost sharing. So if an organization is growing in size over time, their cost sharing will go up, but it doesn't go up, based on longevity with the program. We've also used some additional private funding at times to in effect, provide a scholarship to help them with their cost-sharing requirement if they're not able to meet it. Over time, any such assistance would decrease because we expect them to build their capacity to meet the match requirement. The match requirement itself has gone up, but it's not based on how long a particular program – a particular site – has been with us.

D. Eisner Okay, thank you very much.

Coordinator Thank you. Our next statement comes from Joanne Jones.

J. Jones I'm Joanne Jones. I'm the program director of AmeriCorps OWCC in the panhandle of Florida. We are a reading tutor program, also from the state of Florida, and I hear one of my fellow program directors Joanna Johnson, and I just wanted build on some of the comments that Joanna had mentioned about the paraprofessional qualifications for our reading tutors.

I'm very concerned about that, because even from our partners who are schoolteachers, have mentioned that they said they feel, too, that by requiring 60 hours of college credit for an incoming AmeriCorps member to be placed in ... be too constricting. They really

feel that it would not help the amount of training time that was required. Because in the state of Florida, to become a paraprofessional, that 60 hours could be in any field, like it could be in legal assisting or anything else. It does not have to be in the field of education. So as a program, we would still be required to do the same amount of training that we do presently when we place a member into a school site.

Our training program is extensive, and they have at least 40 hours of pre-service training before they hit the schools. Then, on a weekly basis, they have one to two hours of training each week on a reoccurring basis. I believe that that training should be to meet the national requirements for the National Reading Council. However, I do believe that that training should be over time. We have members that come in without the training, they come into AmeriCorps for personal development also, and to gain their education awards, so that they can reach that paraprofessional status, or to have that degree that they can come out and become successful as an elementary teacher, perhaps.

But I don't believe that we can put that type of a stringent requirement on them as they're coming into the program, because it's just very difficult as program directors to recruit from a smaller pool of people that have already pre-college under their belt already.

That's one of the big issues. I wanted to bring up that number one, by putting the paraprofessional qualifications on our AmeriCorps members, we're going to limit ourselves on recruitment; but I do feel that each program should be held accountable to be sure that they are training their AmeriCorps members in all of the aspects of reading before they go out into the schools.

The second issue was on the educational award. I agree that the education award should either be transferable for our elderly or retirees, or the opportunity to be like a vista ... at the end of their year, the elderly can withdraw that as a cash stipends, rather than as a education award.

The third issue is the one on the program match dollars. I do want to reiterate on what Marilyn from New York had said on the level of cash match and the level of in kind. If we can remain that grantee section being – especially on operating dollars – higher in the in kind, that's always much easier for our programs to increase in each type of graduated match program that you're required on it.

The fourth issue I wanted to bring up was the timeline of program. Our program has been in existence for several years already, and because of its success, we have also had very strong partnerships. It is the type of thing now that we are getting quality recruits to be AmeriCorps members, we have our community highly involved in that whole process of recruitment of members because they know exactly what they want the members to do and things. I would be opposed to a limitation on the timeframe of the amount of grant that a program can be funded.

The fifth one, very shortly, on sustainability. I hope that when you look at sustainability, that you will require that the programs do not have to be sustained in entirety, but aspects of the program can be sustained through the programs. And that is valued as highly to the program where the program has brought programmatic integration to the – in our case, where this tutoring has been integrated into the school

system, not only by AmeriCorps members, but also by the use of volunteers and other resources that are out in the area.

I would hope that you would consider sections of sustainability, rather than trying to sustain a program intact as it entirely looks. I just wanted to thank you and those are just a few of the comments that I had, and I appreciate this opportunity.

D. Eisner Thank you. Joanne, do you agree with the premise, we're getting feedback. Cecile, are we still on the call?

Coordinator Yes, we are still connected, sir.

D. Eisner Joanne, do you agree with the general principle, that the corporation does have to have some kinds of standards in place, to ensure that when AmeriCorps members are in a position of tutoring, that there is some kind of expectation of quality for the children that they are tutoring?

J. Jones Absolutely. I believe in our program, we have that as part of our screening tool. We give all of our applicants a TAB test, which is the reading section test of adult basic skills, and we want them to score at a certain reading level before they are considered.

D. Eisner Is that a test that you've borrowed from other broader organizations or did you make that one up for your own organization?

J. Jones The test is called the Test of Adult Basic Skills.

D. Eisner Got it.

J. Jones...

D. Eisner Okay, we'll look at that. Thank you. Before we go forward, Cecile, can we get a count on how many folks are left?

Coordinator Yes, sir, we have four parties.

D. Eisner Let me just make sure. If there's anyone else on the call that didn't previously hit *1, but would like to make a statement, can you hit *1 now, so that we get a count of how many folks we still need to hear from?

Coordinator Sir, the count still remains at four.

D. Eisner Terrific. I was just given a letter that we received at the corporation this morning from several members of the House, including Tom DeLay, the Majority Leader; Roy Blunt, the Majority Whip; John Boehner, the Chairman of the Committee on Education in the Workforce, and Pete Hoekstra, the Chairman of the Subcommittee on Select Education, which is on the Committee of Education in the Workforce.

I thought that I would read it into the record since it's obviously an important input for the rulemaking process, and I think that that's the best way to make sure that the field

has access to it, since these transcripts are transcribed and put on our Web site. Let me just read this letter, it will probably take five minutes.

"Dear Mr. Eisner, we are pleased that you are moving expeditiously with the rulemaking process for the AmeriCorps program. While we appreciate the fact that you will be addressing many important issues in the coming weeks, we are writing to detail our requests for the pending regulations.

Over the past several years, the Congress has scrutinized various programs administered by the Corporation for National and Community Service. As a result, we believe there are several substantive changes - in addition to recent reforms enacted through the appropriations process - that must take place at the Corporation to ensure that activities funded under the national service laws are carried out in an effective and accountable manner. In particular, the Committee on Education and the Workforce has spent a great deal of time working on various reform provisions to help garner widespread support for the AmeriCorps program. Accordingly, it is important that any new regulations from the Corporation:

(Interruption) Parenthetically, the rest of the letter is in the form of lists and sub-lists, so I am going to try to be explicit about where we are.

The last phrase is any new regulations from the corporation (Resume letter) Preserve the right of faith-based organizations to retain their religious identity and character, while participating in national and community service initiatives – Religious and faith-based organizations often play a central role in communities across the nation, rallying volunteers, serving the less fortunate, and reaching out to those in need. New regulations should align national service activities with Title VII of the Civil Rights Act of 1964, preserving the rights of faith-based organizations while allowing and encouraging their full participation in national service initiatives.

(Interruption) Now, the second bullet, on new regulations from the corporation should (Resume letter) – Control federal costs - Under current law, there are few statutory restrictions on the amount of money the federal government spends to support individual participants among the national service programs. The dramatic deluge of capital, which formed and funded various coalitions to "save AmeriCorps" clearly shows that there is tremendous non-federal support for national service initiatives, and that programs partnering with AmeriCorps could be increasingly sustained by the corporate community and private sector. Therefore, new rules should reduce the federal share of costs associated with the living stipend, childcare, and healthcare expenses; limit the number of years a grantee may receive federal funds to support full-time participants; and increase the percentage of participants that take part in "education award" programs. New rules issued by the Corporation should address each of these issues, and significantly reduce federal costs by: (Interruption) and this is a sub-list of ways that the Corporation should reduce federal costs (Resume letter) (1) Limiting the federal share of the living stipend (which remains constant at 85% under current law for each 3-year grant cycle) in subsequent grant cycles. (2) Limiting the federal share of childcare costs for full-time participants (consistent with other federal childcare assistance) (3) Providing healthcare for full-time participants based on financial need; (4) Increasing the percentage of participants that will take part in "education award" programs (in which the federal government provides an education award of \$4,725 and operational support of \$400 per participant) to up to 50 percent of all AmeriCorps

positions; (5) Limiting the number of years a grantee may receive funds to support full-time participants.

(Interruption) Then there's the third bullet under the sentence. Accordingly, it's important that new regulations from the corporation address issues pertaining to the long-term sustainability of grantees. (Resume letter) AmeriCorps is often described as a model of efficiency and effectiveness, charged with producing a burst of funds, assistance, and short-term infrastructure development in community organizations, which is then followed and sustained by organizational growth. Unfortunately, this advertised depiction of AmeriCorps is not the common practice. During the course of the last funding cycle, we were especially grieved to hear long-term grantees publicly disparage new grantees and new programs that received AmeriCorps funding. This is a clear signal that grantees believe they are entitled to AmeriCorps funding and perpetuity, which is a far cry from how the program has been presented. Grantees should recognize that partnering with AmeriCorps should be viewed as temporary, and that they need to increase the commitment of the private sector to ensure long-term sustainability of their operations.

(Interruption) The next bullet, "that any of the regulations from the corporations should: (Resume letter) Strengthen financial management to ensure the effective use of federal resources – The rulemaking process should address the financial and accounting weaknesses in current national service initiatives to help ensure that the Corporation will remain fiscally solvent, while effectively using federal resources to improve national service programs. The rulemaking process should (1) strengthen provisions added as part of S.1276, the Strengthen AmeriCorps Act, to improve management of the National Service Trust. Specifically, the new rules should require the Corporation to use a formula to estimate the amount of funds needed to support the National Service Trust that assumes a rate of enrollment of 100%, a rate of earning and national service educational award of least 80%, and a rate of using a national service education award of 80%; and, (2) require the Corporation to ensure that the National Service Trust is adequately maintained and funded. Specifically, the new rules should: (1) ensure timely reporting of enrollment (from states and other recipients of assistance); (2) project the number of approved national service positions that may be supported each fiscal year, with available balances in the National Service Trust; and (3) monitor actual enrollments on an ongoing basis to ensure that balances are sufficient.

(Interruption) The final bullet, "against any new regulations from the Corporation should, (Resume letter) Establish accountability measures – Regulations should require the Corporation to work with all grantees to establish performance measures; require grantees to design corrective plans if they fail to meet performance measures; and provide new authority for the Corporation to reduce or terminate grants if corrections are not made.

We look forward to working with you to implement these commonsense reforms, and urge you to issue regulations that are consistent with these recommendations. In addition, while you focus on improving the accountability of your grantees, we wish to reiterate our high expectations for fiscally sound accounting procedures at the Corporation and inform you that any future violations of the Anti-deficiency Act will not be tolerated. If you have any questions regarding our recommendations, please do not hesitate to contact us. Thank you for taking the time to hear our insight into ways to strengthen the AmeriCorps program through the rulemaking process.

Sincerely, Tom DeLay, Majority Leader; Roy Blunt, Majority Whip; John Boehnerr, Chairman of the Committee on Education in the Workforce; Pete Hoekstra, Chairman of the Subcommittee on Select Education of the Committee on the Education in the Workforce." Thank you. Cecile, let's keep going with the statements.

Coordinator Yes, sir. Our next statement comes from John Heath.

J. Heath There isn't much I'll say this afternoon that hasn't already been said, so I'll keep my comments short. I appreciate you reading that letter. Most of it was pretty inoffensive until they got to talking about the programs that have been around awhile disparaging the new programs. I guess here in Wisconsin, I wasn't aware that that was happening, and certainly, I don't think that anything like that came from any programs in Wisconsin.

We do happen to be a program that's been around about nine years, and certainly, without federal funding, we would not be here. I'm afraid that really any changes in that will doom this program and the people we serve here in La Crosse. La Crosse is a pretty small community, and we don't have a lot of access to other funding, other than the federal money that comes in. We do feel we make good use of that funding. We do a lot of tutoring and mentoring, we also work with reducing hunger and some public safety issues.

Certainly, as a few people pointed out, it's no easier now to get that private funding than it was nine or ten years ago. As Ms. Rosche said, with the cost per member – I think now it's going down instead of going up – and our costs going up, it makes it harder each year to keep us going.

A couple of things outside of sustainability, because I think that's been covered pretty extensively. Again, with the requirements for tutors to be basically paraprofessionals, another concern I have with that is displacing paraprofessionals, who are in the school system. Most of our members do serve as tutors in the school system and we've been very diligent about making sure that we're not displacing anyone else. If we do raise the requirements, I'm afraid both systems will see that as basically a cheap paraprofessional.

Don't have a lot of comments beyond that. I really do appreciate what you folks are doing, giving us this chance to get in early on this process and I'm sure we'll talk to you again later on as this moves forward.

D. Eisner Thank you very much, I appreciate the comments.

Coordinator Thank you. Our next statement comes from Keli Tallman.

K. Tallman Good afternoon. I am a program director of the Governors of AmeriCorps After School Initiative in the state of Iowa. I am also a state youth development specialist with the Iowa 4-H Youth Development program. Similar to our last caller, I don't have a lot of new information to share that hasn't already been said.

I do just want to make a couple points that are of concern to me as a program director of a statewide initiative that consists of both rural and also urban areas, but predominately rural. That actually was kind of our niche, if you will, that we're

addressing in the state of Iowa, is out of time school programming in several rural communities. My comments again, aren't going to be anything really new that others haven't already articulated, but I just wanted to reference some of these topics in connection with program connection criteria.

The first item that I'd like to talk just briefly about is, of course, sustainability. I just want to articulate that I do think that we need to look at the availability, the opportunity, the resources that are available for rural communities versus urban communities in terms of being able to sustain their programs.

I'm not exaggerating, but when I talk about rural communities where some of our out of school time programs are located in, those are communities that have a local KS's gas station, maybe a veterinarian office and a small post office. Obviously, these communities are utilizing their three to six actual entities that they have, as well as some obviously local church groups, etc. But for them to be able to secure in kind as well as cash match is not at the same level in terms of their community resources, as those programs that are located in urban settings.

I just wanted to make sure that I bring that up for staff at the Corporation for National Community Service as they look at program selection criteria in terms of sustainability. I do believe that there aren't as many resources available in the rural communities, as there are in urban communities to address some of those needs in terms of sustainability.

The other item that I also wanted to talk about a little bit is recruitment. Again, others have stated that this year, of course, was one of the first years that I recall, that once an individual does not complete their term of service, that we couldn't not recruit other members to take over that individual's position. As others have stated, some of those issues then that come from that are our community partners that then question the ability to meet some of the objectives that we said we were going to address, when and if, some of our staff members if you will, AmeriCorps members leave, and then we can't re-recruit to fill those empty positions.

The other thing – and again, I say this in the context of program selection criteria – is that at least in the past, my understanding was that programs do get points or get points deducted, if they have individuals who leave their term of service early. While I understand that this is an important consideration to look at as you would look at funding potential programs, I just want to also make sure that as you look in terms of recruitment and retention, that sometimes when individuals leave the program, that they're leaving for very, very valid reasons.

It's not something that means that the program as a whole hasn't addressed, but for instance, some members that are half-time members or full-time members for that matter, are offered opportunities for full-time employment, where they're getting a larger salary, they're getting benefits, etc. Just like any of us, if we had a job opportunity that was going to present better financial stability, as well as professional development opportunity, I think that all of us would go for that. I just throw that out as a consideration as you look at grant applications. If the opportunity is available to actually call the program director and ask them about their retention, if that's going to be one of the issues of whether they get funded or not.

The next item I'd like to talk about, again, has been talked about in depth in terms of the tutoring requirement. I am very in favor of the different statements that individuals have made thus far regarding the tutoring. Another piece of that though, that I would like to talk about a little bit is that the Governors of AmeriCorps After School Initiative – the outreach that the members do and the volunteers and the community partners do with this initiative is actually targeted at middle school students, not elementary school students.

The scientifically based reading research related to the No Child Left Behind Act that all youth by third grade will be reading at grade level, is not applicable to our target age range of middle school students, ages 10 to 14. Again, if you look at program selection and criteria, I certainly hope that other tutoring programs, such as ours, would not be looked upon negatively or have points withdrawn, because we are looking at more the middle school target audience and not the elementary school audience.

Certainly, some of the reading research recommendations in terms of reading comprehension definitely fits with our middle school students and that is one of the things that we target. I just wanted to make sure that I touch upon that tutoring piece.

One other item that I would like to talk about is the reporting requirements that the Corporation for National Community Service requests of all programs. First and foremost, I want to actually thank the Corporation for National Community Service for the performance measures. I think that using the logic model, it makes logical sense – no pun intended. That it keeps us on target in terms of being to articulate the impact that our project sites make on a quarterly basis, and I think that it's fantastic for accountability reasons.

My one concern however, with the reporting requirements is the My APR map and the progress reports. I am a program director of ten after school project sites across the state, but this is only part of my job at the Iowa 4-H Youth Development Program. I am the director of two other grants, as well as some other special projects.

I'll be very honest to say that the reporting requirements are taking up a huge amount of my time. Again, I think that they're very important and that they're needed, but one thing that I question – and I know, David, that you brought this up to another caller – is that what I don't understand is with the previous My APR map, we were to articulate our qualitative and quantitative impact. The Corporation for National Community Service also had at that time, what our objective statements were. And now, of course, have what our performance measures are, that also articulate what our outcomes should be at the end of our quarter or our grant year, depending on how we've written our performance measures.

What I don't understand is that the difficulty in when we put our information in what used to be the former My APR map, not the one that's just been changed recently, we indicated that quantitative and qualitative data. I don't understand then, why we also have to go in and do that into a progress report every single quarter? It takes a lot of time, one, to get ten different quarterly reports from ten different project sites, to review those ten reports, make sure that there's no data missing from those reports. Then, as a program director, I have to aggregate that data from ten project sites into one overall report myself before I even go into the My APR map and the progress report to enter that data, as well as doing a year-end report.

If there is a way to be able to reduce the amount of reporting, that would should be helpful, but also again, keeping us very accountable for what we're doing. Last but not least, and I hope this is all right.

D. Eisner Yes, one more thing is fine. You've run on about ten minutes now, so if you could wrap up quick.

K. Tallman Okay, great. The last thing that I would say, and I thank both you, David, and Rosie, and others at the Corporation for National Community Service in terms of your effort into trying to educate our congressmen on what is Americorp, what is it about? Some of my concerns – and I hope that you will continue as well as all of us across the nation to educate our congressmen that, as one of the other callers said, the living allowance has increased minutely over the past several years, let alone the education award that members receive. My understanding – and I could be incorrect – but my understanding is the education award has not increased at all since it started roughly ten years ago.

I cannot imagine more bang for their buck that the federal government is receiving than what all of us do across the nation with our AmeriCorps programs. So I hope that you will continue to educate our congressmen on the great impact that the AmeriCorps programs do for the amount of money that is allocated toward our initiatives. Again, thank you very much.

D. Eisner Thank you very much.

Coordinator Thank you. Our next statement comes from Carol Vogel.

C. Vogel Carol Vogel from Pennsylvania Mountain Service Corp, and since we're bringing up the rear, I really don't have a lot more to say, except that we support everybody's comments. We also accept the evolving nature of the program. But to maintain our program's credibility at the local level, what we're really asking for in the midst of all these changes is real clear guidance, and plenty of lead time to make all these changes, because we often find that the cart is put before the horse, and it doesn't bode well for our credibility in the local sector.

We're very concerned about sustainability. We thought the one thing that we could hang our hat on that might be different than everything that was discussed was, that we're a rural program, too; and the opportunities that a lot of our sub-program sites or our host sites have for funding us are very limited. So the reality is if we don't have the federal support, then the program basically cannot exist.

It's taken us ten years to really get rooted and establish ourselves in our community, and we don't think that it's really fair just to have the funding handed over to somebody else, so that they can start a new program. It's a competitive process and we'd like the chance to compete, regardless of how long we've been doing it. Because we've felt that the program was originally set up to address community needs, and we assume that there will always be some kind of need in our community. It's never going to be a utopia.

As long as we define what those needs are, and we can substantiate those needs, we'd like the chance to tackle some of those problems in partnerships with different local

organization. We just want to thank you for having us have input, and we do agree with everything that has been said up to this point. Thanks.

D. Eisner Thank you very much. I should note that I appreciate folks saying that they can't add things to what others are saying, but it's actually very important. In addition to the substance of the comments we hear, it's also very important for us to know how many times we hear different comments and what diversity of organizations are providing the same comments for us.

If folks are still thinking about sending anything in writing, don't hold back, and if you're talking to people, tell them not to hold just because they think we're hearing the same point somewhere else. It really is important to us as we analyze who's saying what, and the strengths of different arguments has a lot to do with how many people are saying it. Cecile?

Coordinator Sir, there's one other person, Marilyn Rosche.

M. Rosche I've made my statement, but I just had a quick question. I appreciate your reading of the letter from the House leaders, and I wondered if that is going to be posted on the Web page. Because it seemed to me, that you're under some very specific pressures from Congress, and the more specific we can be in our responses to some of the statements that they're making, perhaps the more helpful it would be.

D. Eisner The reason I read it into the record is so that what we are posting on the Web site is the transcript of these calls. I believe we get them up pretty quickly, so we'll do this in the context of that. We'll get it up as quick as we can.

M. Rosche Great, thank you.

Coordinator Sir, we have one last statement or comment coming in from one other participant. Did you want to take that?

D. Eisner Yes, please.

Coordinator Yes, Kristen Honz.

K. Honz This is Kristen Honz with the Iowa Commission. I just wanted to make a couple of brief remarks. The replacing members issue has been discussed I know, quite considerable; but one of our program directors said that it forces programs to decide between a member who is not very effective versus having no member at all. Which is, I think, as any of us as employers can understand, is not a decision we want the programs to have to make. Just to consider the replacement of members as an important issue.

As well as the tutoring is another thing that's been covered quite at length today, but that the increasing requirements may have the opposite effect of what is desired. If the requirements are so high, it may force programs to not do the tutoring anymore at all, and so leaving no tutors at all for the program and for the children in the communities.

Another concern that was raised by the programs within our state was the performance measure reporting, just that programs requested that there is some consistency among

the performance measures from year to year. That the corporation at least give a couple of years for the programs to be familiar with a certain type of performance measure, so they can be familiar with the exact measurement tools, and reporting tools, and so that they can actually give the measures a chance to be implemented and to evaluate them within their program before there are considerable changes to the measures.

Then, just the last thing that I have is that I would encourage the Corporation for National and Community Service to demystify their processes or to make them more transparent. From my perspective, it's difficult for me to understand, how the grant process works, what the timelines are for that, what the approval process is. To have a better understanding of that, so that we can communicate more effectively with the programs. Oftentimes, we're in the middle and we can't get the relevant information that we need to the programs if we don't know exactly what the systems are that in place.

Then, the other comment that the program directors told us that the education award – I know the congressmen indicated this as well, that they would like to see more ed award programs. Our program directors have said that the cost, the \$400 per member administrative cost is not enough for them to provide all of the measurement and support and monitoring that they need to do for the AmeriCorps program. So while they agree that it's a great possibility for sustainability, that they would recommend that there is a balance between the now relatively higher cost of the member stipend between the \$12, 400 and \$400 per member. So that they can have some sort of middle ground that they can more effectively manage the ed award program. I think those are the only comments that I have, and I appreciate the opportunity.

D. Eisner Thank you, Kristen. On the last point, should I understand you to say that if we were able to bring up the administrative cost under the ed award program, that you'd support having a higher percentage of ed only awards.

K. Honz Yes, what I heard from our programs when we had a conference call, was that they would see a \$2,000 per member cost as a lot more manageable on the administrative side. That would be a figure that they felt they could effectively manage an ed award program, just because there is a considerable amount of administration in monitoring and reporting on the members and the program performance measures.

D. Eisner Can I ask, why they wouldn't just do that through the state national? Why wouldn't they compete with a cost of \$2,000 per member?

K. Honz I think because they are thinking that under the sustainability plan, there's going to be a cutoff point for that – for competing in the regular pool.

D. Eisner Oh, I see. I want to make sure I understand what you're promoting and what your assumption is.

K. Honz Right.

D. Eisner My understanding is that you're saying that it might make sense if, within the rest of state national, we created limitations that we would not then limit the ed award program, so that people would be able to use it as a sustainability plan. But

that if we pursued that path, we would need to have a higher admin fee with the ed award? Did I just summarize it right?

K. Honz Yes, that's exactly it. I think it comes with the assumption that, although I think many of these programs today have advocated quite effectively, that they don't feel that sustainability should be a certain number of years; I think we're hearing clearly from Congress that they want a certain number of years as a cutoff. In our discussions with program directors, they were under the assumption that after a certain X number of time, they would not be eligible to apply for "regular" AmeriCorps funding, but could potentially look at ed award as a way to continue their program. Exactly what you said.

D. Eisner Thank you. Last call, *1 if anyone wants to make a comment.

Coordinator Yes, sir. We have a comment coming in from Alison Carpenter.

A. Carpenter Thank you very much. I just wanted to say to Kristen, that that was only four members of Congress, by no means everybody. I think it's just important to say that. That's all.

D. Eisner Thank you.

A. Carpenter Thank you.

D. Eisner Anybody else.

Coordinator No, sir.

D. Eisner Let me wrap this up then. I will tell you proudly that Rosie and I have now spent about 25 hours listening to testimony. I think Frank has been with us for just about all of that. In addition, we've had innumerable other kinds of informal meetings with folks in the field, and the commissions, and other groups talking about it.

We are now immediately following this call, going to move out of what I had been previous saying as sort of our no predetermined role. At this point, we're going to start actually examining – first of all, analyzing what we heard, and then examining options. We hope quickly to be able to start talking with O&B about what our draft process is.

We're going to continue to be interested in any and all comments that we hear from the field. We're hoping that within the next – hard to tell when – sometime between the next six and twelve weeks, we will be getting draft rules to the field for public comment. At that point, or prior to that, we will announce what the format of comment we are planning on accepting is, and that will be open for at least 60 days for us to be receiving comment. After which, we will then analyze the comments we've heard and issue final rules.

If anyone on the call or anyone that you know had a point of view that should be expressed, please sooner, the better. We hope that everyone understands that as we start drafting and thinking through specific rules as a corporation, our ability to engage in integrative conversations will become more and more diminished. From the time that we've actually issued draft rules, at that point, we're going to have to be very restrictive

in terms of how we engage in a conversation, since any input that we receive will have to be recorded and produced on paper as an attachment to the final rules.

Again, I expect to be letting all of you and the rest of the field, know pretty concretely how we plan on managing those communications. With all that, thank you all so much. Rosie, thank you. Frank, thank you. Thanks to all of you on the phone, both those of you that spoke, and those of you that have been following these proceedings. We're adjourned.

R. Mauk Thanks, everybody.

Coordinator Thank you.